

TEXT SIGNED 10-20-97

MEMORANDUM

SUBJECT: Availability of Standards Developed by the National Environmental Laboratory Accreditation Conference for Certification of Laboratories Analyzing Drinking Water Samples

FROM: Cynthia C. Dougherty, Director
Office of Ground Water and Drinking Water

TO: Regional Drinking Water Representatives (Regions I-X)
Regional Laboratory Certification Officers (Regions I-X)

This memorandum is to announce the availability of alternative guidance for use by States in the certification of laboratories under the Safe Drinking Water Act (SDWA). The National Environmental Laboratory Accreditation Conference (NELAC) adopted standards for the certification of drinking water laboratories on July 31, 1997. I support the use of the NELAC standards in the certification of laboratories analyzing drinking water samples and encourage use of the NELAC standards based on the increased opportunity for national consistency in laboratory standards that use of NELAC standards should foster. One of the Agency's primary goals in encouraging the development of and participating in the NELAC has been to encourage States to recognize certification of laboratories by other States, also referred to as "reciprocity."

Under the SDWA regulations for State primacy, States must establish and maintain a program for the certification of laboratories conducting analytical measurements of drinking water contaminants. 40 C.F.R. 142.10(b)(3). EPA can waive the requirement to establish and maintain a laboratory certification program when all measurements for compliance with national primary drinking water regulations are conducted at laboratories operated by the State and certified by EPA. To support States' laboratory certification programs, EPA has published and distributed a laboratory certification guidance entitled, "Manual for the Certification of Laboratories Analyzing Drinking Water," EPA 815-B-97-001, March 1997. Today, EPA announces that recognition of a State's laboratory certification program by the National Environmental Laboratory Accreditation Program (NELAP) will assure that the State program meets the primacy requirements relating to laboratory certification. In addition, NELAP accreditation of laboratories operated by the State will satisfy requirements of 40 C.F.R. 142.10(b)(4), which addresses the capacity of State laboratories to perform measurements of regulated contaminants in drinking water samples.

In order to assure prompt evaluation and recognition of State laboratory certification programs by July 31, 1998, the first group of States seeking recognition as NELAP-accredited certification authorities should submit completed applications to the NELAP staff by December 31, 1997. Application information is available by contacting Jeanne Mourrain at 919-541-1120.

EPA's Technical Support Center located in Cincinnati, Ohio will work with the NELAP staff and EPA Regions to assure implementation of the program.

I would like to emphasize that this is a voluntary program and States may choose to continue to be certified under the existing program which is based on the Agency's existing 1997 laboratory certification manual. But now that NELAP has published certification standards for drinking water laboratories, States may now seek NELAP recognition as an accrediting authority for the certification of laboratories (and, if they wish, continue to certify small laboratories and in state utility laboratories only under their currently approved laboratory certification program). Both options are acceptable in terms of maintaining primacy and producing data for compliance purposes.

I anticipate that NELAC will enjoy great success and high rates of participation. I expect that the drinking water program nationwide will benefit through State participation in NELAC-accredited certification programs and this will result in better laboratories producing better quality data.

If you have any question concerning the drinking water laboratory certification program and its relationship to NELAC you may call Carol Madding on 513-569-7402 or Ed Glick on 513-568-7939.